

Before the
Federal Communications Commission
Washington DC 20554

In the Matter of)	
)	
Inquiry Regarding Carrier Current)	ET Docket No. 03-104
Systems, Including Broadband over)	
Power Line Systems)	

Reply Comments of Enikia LLC

Enikia® LLC is pleased to submit the following Reply Comments in response to the comments filed on the Commission's Notice of Inquiry (NOI) regarding Carrier Current Systems, including Broadband over Power Line systems.

INTRODUCTION

The comments received in response to the NOI in general would seem to bring a few major points to light. The first is that BPL is real and viable, and there is a vast amount of work completed and in progress by companies and organizations involved in Powerline communication. In addition, there are a large number of HomePlug compliant devices already operating in the field, as well as a number Access BPL trials taking place, which offer valuable insight and experience on interference potential. The second is that many respondents have expressed concern and caution, without having a full understanding of what BPL is, how it operates, and what has already been accomplished and tested. The third is that although much work has been done, BPL technology in all its forms is still

and evolving technology, and must be allowed to continue to evolve, test, improve, and standardize, so that its full benefit can be realized. The last point is that existing rules and test methods work and provide protection from interference, and no changes are required at this time.

BPL WOULD BENEFIT CONSUMERS AND UTILITIES

BPL technology has enormous potential to benefit both consumers and utilities. The benefits to consumers are well known, with the expanded availability of broadband Internet access, home networking, enhanced services, etc. Utilities could utilize BPL in a countless number of ways, both by being able to enhance and expand the services they offer to their customers, as well as being able to improve and stabilize their own networks, which in light of recent events is also very important.

PRODUCTS AND SERVICES HAVE BEEN DEPLOYED

There have been many thousands of HomePlug compliant devices sold, and there are a number of access trials ongoing, and there have been no reported instances of significant interference to licensed services, or other networks, resulting from these devices or deployments. In addition, new HomePlug compliant products are continually being brought to market, some with other broadband network interfaces, which further evidence non-interference with other services. There have been many testing efforts completed, including joint testing efforts with licensed service organizations, and there are additional testing efforts ongoing, with no substantial interference problems reported. A large number of respondents have expressed caution about interference potential, and concern about other services being effected, without any basis or analysis. In addition, a few

respondents mentioned earlier Powerline communication technology attempts, and the interference issues that some of them had. These do not materially contribute to the considerations at hand. The process of evolution has, and continues, to work as it should, with technology attempts that do not perform well or that cause interference being abandoned, and newer, better, compliant technologies emerging. This is where BPL technology stands today. Real world testing and analysis has been completed, additional efforts are ongoing, and these should be viewed as the major basis for relevant input.

BPL IS STILL EVOLVING

BPL technology, especially in the access area, is still evolving. We believe the industry needs be allowed to continue to test, perform trials, improve, and standardize the technology in order to realize its greatest potential. We believe the Commission should not adopt standards, but rather allow the industry to standardize and arrive at the best overall solution. We again reiterate that the current regulation requirements and test methods are sufficient for the current state of the industry, and as the technology and understanding improve, the industry in concert with the Commission can improve and change where prudent and necessary.

CONCLUSION

BPL technology, in all its forms, offers vast potential. Some benefits of the technology have already been shown, and additional uses are continuing to be realized. It is imperative that technology and the industry be allowed to continue to evolve and mature, so that the full opportunity and realization is not lost or squandered. The existing Part 15 regulatory scheme has been shown to provide adequate protection to licensed services,

while still allowing the technology development to flourish. We urge the commission to consider realistic testing and interference analysis for future consideration, and we would like to stress that we believe the companies involved in the industry will work closely with the commission to arrive at the common goal of protecting existing services while allowing new technology to reach its full potential.

Respectfully submitted on behalf of Enikia LLC by,

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August 20, 2003

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